



Received by email
14 Sept 2022 @ 2.57 pm

Submission from the AQA to Tasman District Council – Discharge permit in relation to aggregate extraction 134 Peach Island Road, Motueka (RM220578)

September 2022

Accepted as late submission under sections 37 & 37A RMA

Under delegated authority

Alastair Jewell, Principal Planner

dated 25 October 2022



Introduction

This submission to Tasman District Council on CJ Industries proposed aggregate extraction at 134 Peach Island Road, Motueka (RM220578), is made by the Aggregate and Quarry Association of NZ (AQA).

The AQA is the industry body representing construction material companies which produce an estimated 50 million tonnes of aggregate, sand and quarried materials consumed in New Zealand each year.

As an industry body, the AQA would not be directly affected by this issue, nor could it gain an advantage in trade competition through this submission. While CJ Industries are a member of our association, we are making this submission in the interests of the extractives industry, which has an important role to play in Tasman in supplying essential sand and aggregate necessary for climate change mitigation, housing and associated infrastructure development.

Submission

We support the granting of consent for application RM220578, and the associated applications RM200488 and RM200489 for the extraction of aggregate from the area identified in the applications.

As we have covered everything in our submission, we do not wish to be heard in support of our submission.

The reasons for making this submission are:

Aggregate (crushed rock, gravel and sand) is an essential resource for the construction of housing, roading projects and other transport infrastructure. It is used for general construction - in concrete, asphalt, mortar and other building products.

Aggregate is also important for increasing resilience and adapting to extreme weather events and climate change.

Due to the unprecedented levels of construction and infrastructure development activity, aggregate is increasingly in short supply in many parts of New Zealand including Tasman.

Not only is there high demand, but supply is also constrained. Aggregate deposits are 'location specific' and limited in quantity, location and availability. They can only be sourced from where they are physically located and where the industry is able to access them.

Aggregate is unique amongst the resources as it is the only one that it is not viable to import due to its high weight and low value. There is a fixed resource endowment within New Zealand that we must work within. It is also a resource that has few practical substitutes and is critical to many infrastructure works as an input into roading, concrete, and ground stabilisation¹.

Aggregate and sand demand is essentially driven by population growth, and infrastructure development and maintenance. The recently released Draft Nelson Tasman Future Development Strategy aims to influence where and how growth occurs in the region over the next 30 years.

Aggregate production in the Nelson Tasman region has been at around 1 million tonnes a year in recent years (in 2020 it dropped to 640,000 due to Covid factors). The region is a higher (per person) user of aggregates than other parts of the country because of its population growth, extensive roading network and lengthy coastal area but the anticipated growth, as reflected in the strategy, suggests this will need to increase.

Looking at housing alone, the anticipated 29,000 new homes needed in the next 30 years amounts to 7.2 million tonnes of aggregate, based on industry averages, or 240,000 additional tonnes being required annually. The extra 7.2 million tonnes shows the extent of the shortfall. Aggregate will either need to be produced locally or imported at a much higher cost to fill this gap.

Nelson Tasman's growing economy and population means there is increasing pressure on appropriate land for quarrying as expanding rural residential areas and competing industrial land uses put areas of aggregate supply at risk. As the population of Tasman grows, a sustained supply of aggregate will not only be required to provide for affordable housing, construction and roading projects associated with this growth, but will also be needed to maintain and redevelop existing infrastructure which is key to unlocking regional economic potential. To do this, it is critical that quarry resources are protected and provided for to supply vital construction materials.

Determining an optimal distance for residential areas from potential quarry areas is important. Too far away means significant expense of transporting quarry materials as well as congestion and CO₂ emissions. (The cost of aggregate doubles when transported 30 kilometres from its source.) Too close brings reverse sensitivity issues due to the nature of extractive industry operations including noise, vibration and dust. Development areas should ideally be as close as reasonable to identified areas of aggregate.

¹ NZ Infrastructure Commission – Infrastructure Resources Study November 2021

The proposed CJ Industries operation at Motueka will provide a continued supply of high-quality aggregate to the Tasman construction market.

The operation will provide for direct employment for on-site staff and indirect employment for numerous other workers within the construction and roading industries including, truck drivers, administrative staff and contractors. The proposal promotes community economic wellbeing and the efficient, sustainable use and development of resources.

Quarries, particularly alluvial extraction sites, in proximity to groundwater/drinking water sources are not uncommon and effects can be managed effectively. Quarrying is a high value and temporary land use, with site restoration (including backfilling) a critical element to ensure that land is available for future generations. In many cases, site restoration can result in the delivery of valuable new habitats, contributing towards national biodiversity targets and wider 'net gain' ambitions.

We understand CJ Industries is proposing best practice mitigation measures for the site and has developed a detailed management plan. AQA is supportive of CJ Industries commitment to going 'beyond compliance' and encourages and assists all its members in implementing environmental good practice.

The quarry industry currently works collaboratively with local communities and councils to reduce the environmental impacts and meet legal requirements of environmentally sustainable operations.

The proposed activity is consistent with Part 2 of the RMA and the applicable policy framework of the relevant planning documents.

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Alastair Jewell

From: AQA Office <office@aqa.org.nz>
Sent: Wednesday, 14 September 2022 2:57 pm
To: Alastair Jewell
Cc: hayden@planscapes.co.nz
Subject: AQA Submission - Discharge permit in relation to aggregate extraction 134 Peach Island Road, Motueka
Attachments: AQA Submission - Tasman Council 2022.pdf
Importance: High

Good afternoon

Please find attached the AQA's submission on discharge permit in relation to aggregate extraction 134 Peach Island Road, Motueka (RM220578).

Apologies for the lateness. We ask that you consider an extension of time under s37/37A of the Resource Management Act 1991. We are a very small organisation with a significant workload and minimal resources.

Kind regards
Sarah

Sarah Walker | **Business Manager** | [AQA www.AQA.org.nz](http://www.AQA.org.nz) | [MinEx www.MinEx.org.nz](http://www.MinEx.org.nz)

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